

PHILLIP A. TALBERT
United States Attorney
ROBERT C. ABENDROTH
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN TRUJILLO, AND
DAVE GUADALUPE LOPEZ.
Defendants.

CASE NO. 2:22-CR-00204-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: December 11, 2023
TIME: 9:00 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

1. By previous order, this matter was set for status on December 11, 2023 before the honorable Judge William B. Shubb. Thereafter, this matter was reassigned to the Honorable Dale A. Drozd.

2. By this stipulation, defendants now move to continue the status conference until February 6, 2024 at 9:30 a.m., and to exclude time between December 11, 2023, and February 6, 2024, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has tendered discovery a portion of which is subject to a protective order. The discovery in this matter is quite voluminous consisting of multiple gigabytes of data.

b) Counsel for defendants desire additional time to review the discovery materials

1 and charges, conduct investigation, conduct research related to the charges, to assess the viability
2 of any pretrial motions, and arrange for in-person visits to discuss potential resolutions with their
3 clients.

4 c) Counsel for defendants believe that failure to grant the above-requested
5 continuance would deny them the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendants in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 *et seq.*, within which trial must commence, the time period of December 11, 2023 to February 6,
13 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local
14 Code T4] because it results from a continuance granted by the Court at defendant's request on
15 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
16 best interest of the public and the defendant in a speedy trial.

17 **[CONTINUED ON NEXT PAGE]**
18
19
20
21
22
23
24
25
26
27
28

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: December 8, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ ROBERT C. ABENDROTH
ROBERT C. ABENDROTH
Assistant United States Attorney

Dated: December 8, 2023

/s/ TODD DAVID LERAS
TODD DAVID LERAS
Counsel for Defendant
ADRIAN TRUJILLO

Dated: December 8, 2023

/s/ TASHA PARIS CHALFANT
TASHA PARIS CHALFANT
Counsel for Defendant
DAVE GUADALUPE LOPEZ

ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for December 11, 2023 is continued to February 6, 2024 at 9:30 a.m. before the undersigned and time is excluded between December 11, 2023, and February 6, 2024, under Local Code T4.

IT IS SO ORDERED.

Dated: December 11, 2023

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE